

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:23-cv-811**

DAVID RYAN WOOD,

Plaintiff,

v.

**WELLPATH, LLC; THE COUNTY OF
ROWAN; J. TRAVIS ALLEN in his official
capacity; KEVIN AUTEN, in his individual
capacity; GREGORY HANNOLD in his
individual and official capacity; OFFICER
JERRY EWART in his individual capacity;
JOHN DOE CORPORATION/
PENNSYLVANIA NATIONAL MUTUAL
INSURANCE COMPANY; KEVIN JOHN
CORRIGAN in his individual capacity;
ASHLEY ROWLAND in her individual
capacity; JACQUELIN MICHELE
WILLIAMS in her individual capacity;
UNKNOWN WELLPAT PROVIDER(S),**

Defendants.

**DEFENDANT PENNSYLVANIA
NATIONAL MUTUAL CASUALTY
INSURANCE COMPANY'S
MOTION FOR EXTENSION OF
TIME TO SERVE MOTIONS,
ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

NOW COMES defendant Pennsylvania National Mutual Casualty Insurance Company (incorrectly designated in the caption as Pennsylvania National Mutual Insurance Company but hereinafter referred to as "Penn National") and hereby moves this Court pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an order extending the time for Penn National to file motions, answer, or otherwise respond to plaintiff's Complaint for 30 days up to December 6, 2023. In support of this motion, defendant Penn National respectfully shows unto the Court that the Complaint was served by Federal Express on October 16, 2023; that the time for serving motions or responsive pleadings has not expired, and this defendant needs additional time in which to obtain the necessary information to respond to the Complaint.

The undersigned represents that he has conferred with counsel for plaintiff, Elliot S. Abrams, and he has no objection to the extension of time requested herein.

{SBH:526978.}

The undersigned respectfully shows that the parties will not be prejudiced in affording this defendant an extension of time to respond to the Complaint.

The undersigned further represents that he is submitting this motion to extend time for the purpose of obtaining additional time for defendant Penn National to respond to the plaintiff's Complaint, and not for the purpose of making a general appearance for defendant Penn National at this time.

WHEREFORE this defendant respectfully prays that the Court enter an Order allowing Pennsylvania National Mutual Casualty Insurance Company an additional thirty (30) days up to and through December 6, 2023, in which to respond to Plaintiff's Complaint as provided by law.

This the 6th day of November, 2023.

s/ Ned A. Stiles

Ned A. Stiles

N.C. State Bar No.: 8997

Attorney for Defendant Pennsylvania National
Mutual Casualty Insurance Company

Stiles Byrum & Horne, LLP

The Arlington, Suite 650

325 Arlington Avenue

Charlotte, North Carolina 28203

Telephone: 704-332-2830

Facsimile: 704-332-3281

nstiles@sbhlaw.net

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document *Defendant Pennsylvania National Mutual Casualty Insurance Company's Motion for Extension of Time to Serve Motions, Answer or Otherwise Respond to Plaintiff's Complaint* with the Clerk of the Court using CM/ECF system which will send notification of such filing to the following:

Elliot S. Abrams
Cheshire Parker Schneider, PLLC
P.O. Box 1029
Raleigh, NC 27602
elliott.abrams@cheshirepark.com
Attorneys for Plaintiff

This the 6th day of November, 2023.

s/ Ned A. Stiles